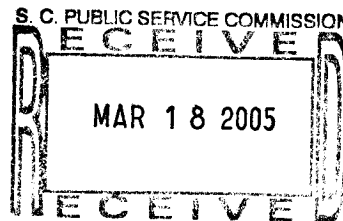
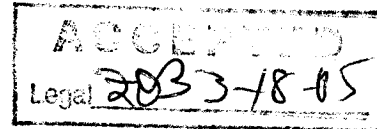


ELLIS:LAWHORNE

John F. Beach
Direct dial: 803/343-1269
jbeach@ellislawhorne.com

173189



JA-3
M-1
ORS-1

March 18, 2005

VIA ELECTRONIC AND HAND-DELIVERY

The Honorable Charles L.A. Terreni
Executive Director
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211

RE: South Carolina Electric & Gas Company Annual Review of Base Rates for
Fuel Costs
Docket No. 2005-2-E, Our File No. 925-10289

Dear Charles:

Enclosed is the original and ten (10) copies of the **Joint Motion to Postpone Hearing** for filing on behalf of SMI Steel-South Carolina ("SMI") and the South Carolina Energy Users Committee ("SCEUC") in the above-referenced docket. By copy of this letter, I am serving all parties of record and enclose my certificate of service to that effect.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it via the person delivering same.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,

John F. Beach

JB/cr

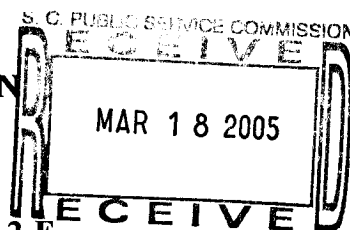
cc: Damon Xenopoulos, Esquire
all parties of record

Enclosures

F:\APPS\OFFICE\WPWIN\WPDOCS\SCPCA\Horry Telephone\walsh.petition.wpd

1- Spear

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**



In the Matter of:)
)
South Carolina Electric & Gas Company)
Annual Review of Base Rates for Fuel)
Costs)
)

Docket No. 2005-2-E

JOINT MOTION TO POSTPONE HEARING

SMI Steel-South Carolina ("SMI") and the South Carolina Energy Users Committee ("SCEUC") move to postpone the hearing in this proceeding, and to extend all deadlines for filing testimony in this proceeding by an equal amount of time. At bottom, the current schedule does not allow sufficient time for adequate participation by SMI and SCEUC.

SMI and SCEUC state the following grounds in support of their motion.

1) In this proceeding, SCE&G is proposing to increase its base fuel factor by 0.578 c/KWh, to the enormous figure of 2.342 cents/KWh. If allowed, this will constitute a thirty-three percent increase over SCE&G's currently effective fuel factor of 1.764 c/KWh. The new fuel factor, and the increase, would both be extraordinarily large.

2) According to the current schedule in this proceeding, the hearing is set for April 6, 2005, a mere thirty-five calendar days after March 2, 2005, the date on which South Carolina Electric & Gas Company ("SCE&G") filed its direct testimony in this proceeding. Said testimony constituted the first notice to SMI and SCEUC of SCE&G's proposed increase.

3) SMI and SCEUC promptly reviewed SCE&G's testimony of March 2, 2005, and issued their first sets of interrogatories to SCE&G on March 8 and 9, 2005, respectively.

4) SCE&G is required to respond to SMI's and SCEUC's first sets of interrogatories by March 18 and 21, 2005, respectively. Intervenor testimony is due on March 23, 2005, a mere two or three business days after intervenors receive responses to their first sets of interrogatories.

5) Intervenor testimony has yet to receive answers to their first sets of discovery requests. Only when they receive those responses will they know how much more discovery is warranted.

6) It is likely that intervenors will need to ask SCE&G questions as a follow-up to SCE&G's answers to intervenors' first sets of discovery requests, in order to clarify, understand and explore, information provided in some of the responses.

7) The statutory procedure set out in Section 58-27-265 is extraordinary, in that customers cannot assess their potential interest in the proceeding, or their need for discovery, until they see the utility's initial testimony. While many of this Commission's proceedings are initiated by a filing pre-testimony (e.g., a proposed tariff), that is not so in this case. In those other cases intervenors can either immediately determine, from a review of the initial filing, whether they have an interest in the proceeding or they have sufficient time before the hearing to conduct discovery so as to make that determination. In the present case, the first notice intervenors had of the extent of SCE&G's intended rate increase, or its economic justification for the same, was when SCE&G set forth its position *in* its initial testimony. Prior to reviewing said testimony, intervenors did not

know what, if any, discovery was warranted in order to assess SCE&G's position. The short amount of time between that filing and the hearing makes it impossible for intervenors to conduct meaningful discovery. Accordingly, the extraordinary nature of the fuel cost proceeding under Section 58-27-865, coupled with the magnitude of the proposed increase, creates circumstances where granting this Motion is appropriate.

8) Unless the hearing is postponed, thereby allowing intervenors more time to do discovery and prepare their testimony, SMI and SCEUC will be unable to adequately prepare for the hearing.

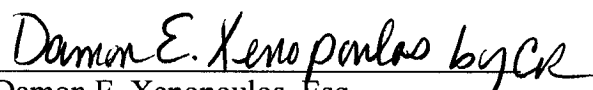
9) In the circumstances, SMI and SCEUC view two weeks as the minimum extension necessary in order to facilitate at least one more round of discovery and allow the preparation of testimony that incorporates the responses to that discovery. SMI and SCEUC, therefore, respectfully request that the Commission postpone the hearing date *at least* two weeks, and extend all deadlines for filing testimony to mirror the postponement of the hearing.

10) We are pleased to report that the Office of Regulatory Staff has indicated that it will not oppose this motion.

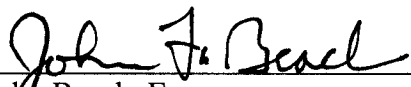
11) Unfortunately, SMI and SCEUC were unable to resolve this matter through discussions with SCE&G.

WHEREFORE, for the reasons set forth above, SMI and SCEUC respectfully request that the Commission postpone the hearing in this proceeding, and extend all other dates, at least fourteen calendar days.

Respectfully submitted,



Damon E. Xenopoulos, Esq.
BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.
1025 Thomas Jefferson Street, N.W.
Eighth Floor -- West Tower
Washington, D.C. 20007



John Beach, Esq.
ELLIS, LAWHORNE & SIMS, P.A.
1501 Main Street, 5th Floor
Columbia, SC 29201

Counsel for SMI Steel-South Carolina



Scott Elliott, Esq.
ELLIOT & ELLIOT, P.A.
721 Olive Street
Columbia, South Carolina 29205

Counsel for the South Carolina Energy
Users Committee

**BEFORE THE
SOUTH CAROLINA
PUBLIC SERVICE COMMISSION**

In the Matter of:

South Carolina Electric & Gas Company
Annual Review of Base Rates for Fuel Costs

Docket No. 2005-2-E

This is to certify that I have caused to be served this day, one (1) copy of the **Joint Motion to Postpone Hearing**, by first-class mail service as follows unless otherwise noted:

Catherine Taylor, Esquire
SCANA Corporation
Legal Department MC130
1426 Main St.
Columbia SC 29201

Mitchell Willoughby, Esquire
Willoughby & Hoefer, PA
Post Office Box 8416
1022 Calhoun St., Suite 302
Columbia, SC, 29202

South Carolina Energy Users Committee
Scott A. Elliott, Esq.
Elliott & Elliott
721 Olive St.
Columbia SC 29205

Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia SC 29211


Carol Roof

Columbia, South Carolina
March 18, 2005